

**Rich, Joseph F.**

---

**From:** Ernesto R. Irizarry, Attorneys At Law <lawfirm@prtc.net>  
**Sent:** Wednesday, February 01, 2012 2:14 PM  
**To:** Rich, Joseph F.; carlos  
**Cc:** ra@correaacevedo.com  
**Subject:** Re: Case 3:11-cv-01303-DRD Great Northern Insurance Company v. El Legado & Real Legacy, et al.

**Importance:** High

Dear Brother Counsels:

Real Legacy is still not a defendant in the case at bar.

Real Legacy has not agreed to start any discovery.

Real Legacy filed a motion to dismiss for lack of coverage, which is still to be resolved by the Court, before we engage in a discovery process.

Cordially,

**ERNESTO R. IRIZARRY**      **Cel. 787 319-1752**  
Attorneys At Law

**Federal & Local Civil Defense Litigation**

Visit our website at: <http://www.ernestoririzarryattorneys.com/>

**Capital Center Bldg.**  
**South Tower - Suite 702**  
**239 Arterial Hostos Ave.**  
**San Juan, P. R.**

**Mailing Address:**  
**P. O. Box 363331**  
**San Juan, PR 00936-3331**

Tel. 787 771-0200 Fax 787 767-0708

**Emails:** [erilaw@prtc.net](mailto:erilaw@prtc.net) y [lawfirm@prtc.net](mailto:lawfirm@prtc.net)

**Confidentiality Notice:** This e-mail transmission may contain confidential or legally privileged information that is intended only for the individual or entity named in the e-mail address. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or reliance upon the contents of this e-mail is strictly prohibited. If you have received this transmission in error, please reply to the sender, so that we may arrange for proper delivery. Thank you.

----- Original Message -----

**From:** Rich, Joseph F.  
**To:** [erilaw@prtc.net](mailto:erilaw@prtc.net) ; [lawfirm@prtc.net](mailto:lawfirm@prtc.net) ; carlos  
**Cc:** Roberto Abesada Agüet Esquire ([ra@correaacevedo.com](mailto:ra@correaacevedo.com))  
**Sent:** Friday, January 20, 2012 11:50 AM  
**Subject:** Case 3:11-cv-01303-DRD Great Northern Insurance Company v. El Legado & Real Legacy, et al.

Counsel,

Attached please find our cover letter, Plaintiff's Initial Disclosures under Rule 26, and Interrogatories and Request For Production directed to your clients.

Thank you

Joe

**Joseph F. Rich | Cozen O'Connor**  
1900 Market Street | Philadelphia, PA 19103 | Phone: 215-665-7285 | Fax: 215-701-2177  
[jrich@cozen.com](mailto:jrich@cozen.com) | [www.cozen.com](http://www.cozen.com)

*Please consider the environment before printing this email.*

---

***Notice: To comply with certain U.S. Treasury regulations, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments, is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding any penalties that may be imposed by the Internal Revenue Service.***

---

***Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.***